



# USAID | AFGHANISTAN

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## Office of Afghanistan & Pakistan Affairs (OAPA)

### INITIAL ENVIRONMENTAL EXAMINATION

#### PROGRAM/ACTIVITY DATA

**Country Code:** 306  
**Program Area:** Infrastructure  
**Assistance Objective:** Sustainable Agricultural-led Economic Growth Expanded.  
**Intermediate Results:** Employment Opportunities Increased.  
**Country or Region:** Afghanistan  
**Activity Name:** Energy and Natural Resources Development Support (ENRDS)  
**Funding Period:** March/2017 to March/2022  
**Life of Project (LOP) Amount:** 43,000,000  
**IEE Prepared by:** Khalid Ludin  
**Date:** 8/11/2016  
**IEE Amendment (Y/N):** N

#### ENVIRONMENTAL ACTION RECOMMENDED: (place X where appropriate)

Categorical Exclusion	<input type="checkbox"/>	Deferral	<input type="checkbox"/>
Positive Determination	<input type="checkbox"/>	Negative Determination	<input type="checkbox"/>
Negative Determination With Conditions	<input checked="" type="checkbox"/>	Exemption	<input type="checkbox"/>

Climate Change  
 Vulnerability Risk
 

None <input type="checkbox"/>	Low <input checked="" type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>
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## 1.0 PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

### 1.1. Purpose and Background

The purpose of this IEE is to provide threshold determinations for the proposed Energy and Natural Resources Development Support (ENRDS) to provide a broad range of technical and professional services that address energy and natural resources that will develop institutional capacity within Government of Afghanistan (GOA) ministries with responsibility for energy development, enable them to perform transactional independently, and enable Afghan entities such as Da Afghanistan Brishna Shirkat (DABS) and Afghanistan Gas Enterprise (AGE), to become self-sustaining. Dependent on the composition of the task orders, the objectives of this activity include, but are not limited to:

1. Developing the ability of GOA ministries to contract for international oil and gas resource, feasibility and environmental and social impact assessment, production, refining, transportation and distribution;
2. Assisting GOA ministries to adopt and apply international standards and practices within the energy and natural resources sectors consistent with GOA international environmental and climate change obligations;
3. Promulgating sound strategic planning and implementation capabilities within GOA ministries;
4. Assisting GOA in formulating and adopting policy, laws, and regulatory requirements for energy and natural resource development; and


DCN: OAPA-17-NOV-AFC-0004  
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Energy and Natural Resources Development Support (ENRDS), IEE

A/COR, OBM, Activity Manager

Clearances:

Date:

  
Khalid Ludin

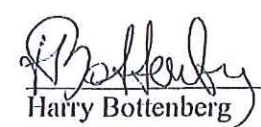
10/17/2016

OI, Office Director

  
Teresa Miller

10/25/2016

Mission Environmental Officer

  
Harry Bottenberg

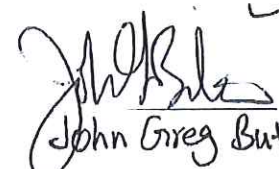
10-17-2016

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John Greg Butler

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Deputy Mission Director

  
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Mission Director

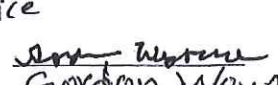
  
Herbert Smith

11/1/16

Approval:

Date:

g Bureau Environmental Officer for office  
of Afghanistan and Pakistan

  
Gordon Weynand

11/2/16

DISTRIBUTION: MEO, COR/AOR, OAA, RLO



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Vulnerability Risk                      None ☐      Low ☒      Medium ☐      High ☐

**1.0 PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION**

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The purpose of this IEE is to provide threshold determinations for the proposed Energy and Natural Resources Development Support (ENRDS) to provide a broad range of technical and professional services that address energy and natural resources that will develop institutional capacity within Government of Afghanistan (GOA) ministries with responsibility for energy development, enable them to perform transactional independently, and enable Afghan entities such as Da Afghanistan Brishna Shirkat (DABS) and Afghanistan Gas Enterprise (AGE), to become self-sustaining. Dependent on the composition of the task orders, the objectives of this activity include, but are not limited to:

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2. Assisting GOA ministries to adopt and apply international standards and practices within the energy and natural resources sectors consistent with GOA international environmental and climate change obligations;
3. Promulgating sound strategic planning and implementation capabilities within GOA ministries;
4. Assisting GOA in formulating and adopting policy, laws, and regulatory requirements for energy and natural resource development; and

5. Creating an environment within GOA ministries and entities that champions and fosters enabling conditions for private sector investment in energy and natural resource development in environmentally sustainable and socially equitable manner.

The IEE provides a brief statement of the factual basis for the Threshold Decision whether an Environmental Assessment or an Environmental Impact Statement is required for the subject activity.

## **1.2. Activity Description**

The services to be provided by the Contractor via Task Orders under this Indefinite Delivery/Indefinite Quantity (IDIQ) contract are technical assistance and engineering services related to the energy and natural resource development sectors.

A wide variety of technical assistance will be called upon when needed, that promote reforms and improve Afghan capacity to achieve energy delivery and efficient natural resources development through better sector planning and management, and improving economic, environmental, and social performance in all areas of the energy and natural resources development sectors.

The project will strive to improve the capacity of GOA Ministries with regard to environmental laws and regulations in support of the Afghan energy and oil/gas sectors.

The Contractor must provide a full range of long-term and quick response professional services that fall into three general categories:

1. Services and activities to establish or improve the legal and regulatory framework; develop the capacity of GOA ministries to plan for, procure and manage resource development agreements; advise on structuring regional cooperative agreements; provide transactional assistance; develop project assessment methodologies and strategies; and provide advice on policies.
2. Services and activities to improve the technical capacity and operational performance of Afghan government institutions and state-owned enterprises such as the Ministry of Mines and Petroleum (MOMP) and the AGE.
3. Services and activities to facilitate private sector investment in the Afghan natural resources and energy sectors particularly support for independent power producers and public private partnerships.

Broadly defined, the task orders will address the following:

1. Technical Assistance and Capacity Building for Afghan Government Agencies (MoMP, MoEW, DABS, AGE). This will include engineering and technical assistance, and recommendations in the planning of new activities requested, to include conceptualization, analysis, and approval documentation.
2. Energy Production transactional assistance: The contractor will provide technical assistance to promote the production of electrical power in Afghanistan.
3. Oil and Gas Sector: The contractor will provide technical assistance and engineering services to design and implement reforms in the oil and gas sector that promote greater competition and private participation, and improve the economic and environmental performance of the sector.

4. Privatization and Corporatization of the AGE: The contractor must provide technical assistance to enhance corporate practices in the AGE and develop privatization strategies.
5. The contractor must provide technical assistance to design and implement programs that enhance mineral exploration and mining operations and promote regional exploration planning and mining investment.

#### Lessons Learned:

SGGA helped MoMP in preparing application for certificate of environmental compliance in coordination with NEPA, including the environmental scoping study and a recommended environmental management plan. The application was approved by NEPA. Although TPAO, as MoMP's contractor, was required to comply with the environmental management plan. After repeated urging by SGGA, MoMP finally agreed to follow petroleum industry practice and assigned MoMP engineers to monitor and oversee drilling and re-entry operations.

However, environmental compliance was of minimal concern, especially after the completion of operations when MoMP performed only a cursory inspection of drilling locations and roads and reported that no problems were detected. However, an independent assessment commissioned by SGGA found that TPAO failed entirely to clean up and conduct required remediation at the work locations, even failing taking basic steps such as treating and covering sanitary disposal pits and picking up garbage.

At SGGA's insistence, this became an issue in the resolution of the final payments under the contract. Because insurgent presence in the area hampered access to the area to complete cleanup and site remediation, TPAO later offered to reimburse MoMP for future cleanup costs as required by the contract.

#### Support environmental compliance with Local and international Laws:

MoMP lack of prioritization of environmental requirements. The experience of USAID SGGA project showed that it was a constant struggle to keep the Ministry engaged in environmental issues. SGGA had to complete required environmental work on behalf of MoMP and continually insist that it be processed and submitted to NEPA.

ENRDS will encourage concerned Ministries to include environmental legal regime into related laws and regulations.

## 2.0 COUNTRY AND ENVIRONMENTAL INFORMATION<sup>1</sup>

### 2.1 Locations Affected

While the assistance will take place at key Ministries in Kabul, the results of the assistance through improved policies, regulations and capacities will be felt across the entire countries wherever exploration for natural resources and the areas downstream is or will be taking place.

### 2.2 Socio-economic baseline

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<sup>1</sup> Please see: [http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2010/04/12/000333037\\_20100412001029/Rendered/PDF/522110ESW0Whit1anistan0Final0Report.pdf](http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2010/04/12/000333037_20100412001029/Rendered/PDF/522110ESW0Whit1anistan0Final0Report.pdf); [http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2011/01/11/000333037\\_20110111004513/Rendered/PDF/E26350SAR1EA1P1Box353824B01PUBLIC1.pdf](http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2011/01/11/000333037_20110111004513/Rendered/PDF/E26350SAR1EA1P1Box353824B01PUBLIC1.pdf); [http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2010/11/16/000334955\\_20101116014820/Rendered/PDF/E25860EA0P12031Framework1appraisal.pdf](http://www-wds.worldbank.org/external/default/WDSPContentServer/WDSP/IB/2010/11/16/000334955_20101116014820/Rendered/PDF/E25860EA0P12031Framework1appraisal.pdf);

Afghanistan is located in Central Asia, north and west of Pakistan, and east of Iran. Afghanistan's economy has improved significantly since the fall of the Taliban regime in 2001 largely because of the infusion of international assistance, the recovery of the agricultural sector, and service sector growth. Despite the progress of the past few years, Afghanistan is extremely poor, landlocked, and highly dependent on foreign aid, agriculture, and trade with neighboring countries (Table 1). Much of the population continues to suffer from shortages of housing, clean water, electricity, medical care, and jobs. Insecurity and the Afghan government's inability to extend rule of law to all parts of the country pose challenges to future economic growth. It is expected to take the remainder of the decade, and continuing donor aid and attention, to significantly raise the average Afghan's living standards from its current level, which is among the lowest in the world. While the international community remains committed to Afghanistan's development, pledging over \$24 billion at three donor conferences since 2002, Kabul will need to overcome a number of challenges, including expanding poppy cultivation, budget sustainability, job creation, corruption, government capacity, and rebuilding war torn infrastructure.

Degradation of the environment and depletion of natural resources are significant and visual consequences of the long period of instability, including depletion of forest cover by 66.5 percent in the south-eastern part of the country over the last 30-year period. Wood is still the main source of energy for over 90 percent of households. Despite the country's challenges, the Afghan government, the United States, and international donors are committed to improving access to basic necessities by prioritizing infrastructure development, education, housing development, jobs programs, and economic reform. Reconstruction projects include national and provincial road construction, water management studies, and alternative power initiatives like micro-hydro power stations.

## **2.1 Policy, Legal and Regulatory Framework and International Conventions**

The primary relevant laws and legislations framing social and environmental issues are: The Environment Law of Afghanistan (2007), the Land Expropriation Law (2005), the Water Law (2004), and the Law on the Preservation of Afghanistan's Historical and Cultural Heritages (2004).

Afghanistan is a party to international agreements on Biodiversity, Climate Change, Desertification, Endangered Species, Environmental Modification, Marine Dumping, and Ozone Layer Depletion. The country also signed the agreement for Hazardous Waste which was recently ratified.

## **2.2 Environment Law of Afghanistan, 2007**

The Environment Law requires the Afghan government to adopt necessary measures to protect natural forests and living conditions of the country. The National Environmental Protection Agency (NEPA) is responsible for the implementation of this law. Following international best practices, NEPA mandates that new activities are screened for potential adverse effects and possible impacts and, if such impacts are likely, a comprehensive mitigation plan is developed for review and approval before the activity can proceed.

In June 2009 NEPA issued the first Afghanistan list of the protected species, which included 46 species.

## **2.3 Land Expropriation Law (LLE), 2005**

The LLE sets out the provisions governing the expropriation or acquisition of land for public interest purposes, such as the establishment/construction of public infrastructure or for acquisition of land

with cultural or scientific values, land of higher agricultural productivity and large gardens. It declares, inter alia, that: a) acquisition of a plot or portion of a plot of land for public use is decided by the Council of Ministers and is compensated at fair value based on current market rates (Article 2); b) the right of the owner or land user will be terminated three months prior to the start of civil works on the project and after the proper reimbursement to the owner or person using the land has been made (Article 6); c) the value of land, value of houses and buildings on the land and value of trees and other assets on the land will be considered for compensation (Article 8); and f) compensation is determined by the Council of Ministers. The Law, however, is silent on resettlement. It makes no special provision for a resettlement plan or indeed any arrangements for resettlement.

#### **2.4 Water Law, 2004**

The Water Law lays out a model for managing Afghanistan's water resources following the principles of Integrated Water Resources Management (IWRM). The law calls for a nested governance structure for water resources decision-making, including participatory models of community-based management through Water User Associations (WUAs) and Irrigation Associations (IAs), operating within a decision-making framework of River Basin Authorities (RBAs) and River Basin Councils (RBCs) in the five major river basins and 41 sub-basins of the country. It sets out requirements for sustainable water allocation and use, and establishes sanctions and penalties for noncompliance.

#### **2.5 Law on Preservation of Afghanistan's Historical and Cultural Artifacts, 2004**

According to The Law on the Preservation of Afghanistan's Historical and Cultural Artifacts, operations that cause destruction or harm to the recorded historical and cultural sites or artifacts is prohibited (Art.11, Art. 16). The law provides guidelines for how to deal with historical and cultural artifacts if they are discovered.

**Table 1. Selected data for Afghanistan**

Socio-Economic Data	Natural Resources/Environment Data		
<p>Total Population- 35.32 million (in 2011)</p> <p>Population Growth Rate (annual %)- 2.03</p> <p>Urban Population (% of total)- 5.69 million (21.9%)</p> <p>Life Expectancy (years)- 49</p> <p>Infant Mortality Rate (per 1,000 live births)- 111</p> <p>GDP (current \$)- 19.5 billion (2011)</p> <p><u>GDP breakdown:</u> Agriculture 34.9 %, Industry 25 % Services- 40 %</p> <p>GDP Growth (annual %)- 8.5</p> <p>Inflation (annual %)- 4.8</p> <p>Unemployment Rate (annual %)- 35</p>	Land use	hectares	% of total
	Irrigated agricultural land	3,302,007	5.11%
	Orchards	94,217	0.15%
	Rain-fed Agricultural Land	4,517,714	7.00%
	Forest Area	1,337,582	2.07%
	Total Pasture Area	29,176,732	45.19%
	Total Land Other-Arid/Desert	26,131,144	40.48%
	Total Land Area	64,559,396	
<p>Population Density- 54.70 persons/km2 (in 2011)</p> <p><u>Livestock:</u> Cattle: 3.72 million, Sheep: 8.77 million Goats: 7.28 million</p> <p>Deforestation Rate (% of change)- 66.5 % (1971-1999)</p> <p>Improved Water Source (% of pop. with access)- 42%</p> <p>Electricity Consumption - 2.226 billion kWh (2009 est.)</p>			

### 3.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

Below are the recommended actions for the activities described above, their impacts on the environment and recommended Threshold Determinations and Conditions, if any:

Activity	Effects on natural or physical environment	Recommended Threshold Determination
<p>Task Orders on technical assistance and engineering services related to the energy and natural resource development sectors:</p> <ol style="list-style-type: none"> <li>Technical Assistance and Capacity Building for Afghan Government Agencies (MoMP, MoEW, DABS, AGE).</li> <li>Energy Production transactional assistance: Oil and Gas Sector: technical assistance and engineering services.</li> <li>Privatization and Corporatization of the AGE: technical.</li> <li>Technical assistance to design and implement programs that enhance mineral exploration and mining operations and promote regional exploration planning and mining investment.</li> </ol>	<p><u>Unknown impact</u> since the exact nature and scope of the task order is not yet defined:</p> <p>After analysis the following outcomes are possible:</p> <ol style="list-style-type: none"> <li><u>No impact</u> if the task order deals only with financial, transactional, procurement and related types of activities.</li> <li><u>Limited to negligible impact</u>, with adherence to mitigation measures, is expected if the task order deals with technical aspects of minerals exploration and energy generation and transmission. Mitigation measures would entail the incorporation of best practices and international standards for environmental management into the capacity building efforts.</li> <li><u>Major potential impact</u>, if the TA will result in large-scale mining. Environmental Assessment (EA) is required.</li> </ol>	<p><b>Negative Determination with Conditions per 22 CFR 216.2(d)(1)(ii)</b></p> <p><u>Conditions:</u> For every task order, the implementer shall develop a sub-activity Environmental Review Form (ERF) with, if warranted, an Environmental Review Report (ERR) with EMMP for review and approval by the COR and MEO. See Annex 1 for a template.</p>

Table 1. Proposed activities and recommended threshold decisions for the ENRDS program.

### 4.0 ENVIRONMENTAL RECOMMENDATIONS

#### **Recommended Action: *Negative Determination with Conditions* (100 % of funding)**

A Negative Determination with Conditions applies to 100% of funding because this project is entirely Task Order based. The Condition is that for each Task Order a sub-activity environmental review will be conducted. The implementer shall develop a sub-activity Environmental Review Form (ERF) with, if warranted, an Environmental Review Report (ERR) for review and approval by the COR and MEO. See Annex 1 for a template.

Task Orders pertain to technical assistance and engineering services related to the energy and natural resource development sectors:

1. Technical Assistance and Capacity Building for Afghan Government Agencies (MoMP, MoEW, DABS, AGE).

2. Energy Production transactional assistance:
3. Oil and Gas Sector: technical assistance and engineering services.
4. Privatization and Corporatization of the AGE: technical.
5. Technical assistance to design and implement programs that enhance mineral exploration and mining operations and promote regional exploration planning and mining investment.

After review of the ERF/ERR, the following outcomes are possible:

1. No impact, if the task order deals only with financial, transactional, procurement and related types of activities.
2. Limited to negligible impact, with adherence to mitigation measures, is expected if the task order deals with technical aspects of minerals exploration and energy generation and transmission. Mitigation measures would entail the incorporation of best practices and international standards for environmental management into the capacity building efforts.
3. Major potential impact, if the TA will result in large-scale mining. Environmental Assessment (EA) is required.

## 5.0 CONDITIONS AND IMPLEMENTER'S PROCEDURES

1. The implementer shall be responsible for execution of all recommendations resulting from this IEE.
2. Each activity should be conducted in a manner compliant with all applicable legislation; regulation and standards of Afghanistan and national obligations under ratified applicable international environmental agreements and conventions; and in their absence with best management and industry practice acceptable to USAID.
3. The implementer(s) shall minimize the use of, and properly dispose of, hazardous materials and waste.
4. For procurement and use of pesticides, including microbials for cleaning of healthcare facilities, the implementer shall adhere to the Programmatic Pesticide Evaluation Report and Safer Use Action Plan (P-PERSUAP), approved by the BEO on September 4, 2013 (see <http://gemini.info.usaid.gov/egat/envcomp/repository/pdf/39391.pdf>). The P-PERSUAP shall be amended when warranted.
5. When equipment (computers; etc.) is procured it should be disposed in an environmentally safe manner at the end of its life by a certified company in accordance with the GIROA laws, and in the absence of such organization, in accordance with international best practice acceptable to USAID (alternatively, when procuring equipment from a licensed provider/dealer an agreement may be reached that such equipment will be returned to the dealer for its environmentally safe disposal).
6. As appropriate, the implementer(s) will obtain necessary approvals from national authorities for environmental compliance documentation, including applicable permits, licenses, etc.
7. All activities will be consistent with good design and implementation practices acceptable to USAID as described in:
  - a. USAID's *Sector Environmental Guidelines* as provided at <http://www.usaidgems.org/sectorGuidelines.htm>
  - b. *EBRD Sub-sectoral Environmental and Social Guidelines* at <http://www.ebrd.com/pages/about/what/policies/guidelines.shtml>
  - c. *ADB Environmental Guidelines* at [http://www.adb.org/sites/default/files/pub/2003/Environmental\\_Assessment\\_Guidelines.pdf](http://www.adb.org/sites/default/files/pub/2003/Environmental_Assessment_Guidelines.pdf)
  - d. *IFC Environmental; Health and Safety Guidelines* as provided at <http://www.ifc.org/ifcext/sustainability.nsf/Content/EnvironmentalGuidelines;>

- e. *World Bank Road and the Environment Handbook* as provided at: <http://web.worldbank.org/WBSITE/EXTERNAL/TOPICS/EXTTRANSPORT/EXTROADSHIGHWAYS/0,,contentMDK:20457855~menuPK:1459669~pagePK:148956~piPK:216618~theSitePK:338661,00.html>
  - f. *World Bank Environmental Handbook and Updates* at <http://go.worldbank.org/LLF3CMS110>
  - g. Any other international best practices readily available from Organisation for Economic Co-operation and Development (OECD), United Nations Environmental/Development Programme (UNEP/UNDP) (or European Union (EU)).
8. The implementer will have a qualified, Mission Environmental Officer (MEO)-approved Environmental Professional(s) (EP) who coordinates the implementation of environmental mitigation measures, monitoring, and reporting to the USAID/Afghanistan Agreements/Contracts Officer Representative (A/COR). Should an EP lack any special technical knowledge to identify any special environmental impact, the implementer will consult with a specialist in the relevant area.
  9. Continuous environmental monitoring, evaluation, reporting and supervision will be conducted during project implementation. Quarterly, semi-annual and annual reports, as applicable, will contain sections on environmental compliance. The implementer(s) will submit an **Environmental Mitigation and Monitoring Plan (EMMP)** as part of ERR for USAID A/COR and MEO approval. An EMMP template is provided in Annex 1, Page 15.
  10. At the "Post-Award Conference", A/COR and the MEO will meet with the implementer to explain conditions established in the original and amended IEEs.

## 6.0 RESOURCE ALLOCATION, TRAINING AND REPORTING REQUIREMENTS

1. The contract with the implementer shall include a requirement to comply with all conditions of the IEE and any other environmental mitigation and monitoring documentation approved by the Bureau Environmental Officer / Office of Afghanistan and Pakistan Affairs (BEO/OAPA). The implementer will be responsible for training its staff and sub-contractors on the contract's environmental requirements and for ensuring compliance of the environmental requirements.
2. The implementer shall have sufficient staff with expertise in an environmental field and resources to implement and report on the expected scope of environmental compliance work. The implementer will document, using cameras/photos, schemes and maps, the status of environmental (and social) conditions on site and in the area of influence prior to, during, and after implementation of projects and activities. This evidence may be also used for providing USAID and GIRA with lessons learned and best practices.
3. The implementer will have the following documentation and reporting requirements associated with environmental compliance:
  - a. Mitigation and Monitoring Reports will be submitted to USAID monthly, and not on an annual basis. Reporting will include photographic documentation and site monitoring reports which fully document that all proposed mitigation procedures were followed throughout implementation of the subject work including quantification of mitigation. All such reports and documentation will be submitted to the A/COR, Management Office and MEO.

## **7.0 LIMITATIONS OF THE IEE**

This IEE does not cover the following:

- Assistance, procurement or use of genetically modified organisms (GMOs) will require preparation of biosafety assessment (review) in accordance with ADS 201.3.12.2(b) in an amendment to the IEE approved by OAPA BEO.
- DCA or GDA programs.
- Procurement or use of Asbestos Containing Materials (ACM) (i.e. piping, roofing, etc.), Polychlorinated Biphenyl (PCB) containing transformers, or other hazardous/toxic materials for construction projects, including lead and mercury.
- Procurement, use, or recommendation for use of pesticides both in agriculture and construction. The contractor shall prepare a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) or see which existing valid PERSUAPs can be amended for the purpose of the project.
- Procurement or use of Ammonium Nitrate (AN) and Calcium Ammonium Nitrate (CAN) fertilizers.

Any of these actions would require an amendment to the IEE and the BEO/OAPA approval by the BEO/OAPA.

## **8.0 REVISIONS**

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” or if additional activities are proposed that might be considered “major” and their effects significant, this IEE will be reviewed and revised by the originator of the project and submitted to the BEO/OAPA for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID COR/AOR to keep the Mission Environmental Officer, USAID/Afghanistan and the BEO/OAPA informed of any new information or changes in scope and nature of the activity that might require revision of the IEE.

## APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Energy and Natural Resources Development Support (ENRDS), IEE

	<b>Clearances:</b>	<b>Date:</b>
A/COR, OBM, Activity Manager	_____ Khalid Ludin	_____
OI, Office Director	_____ Teresa Miller	_____
Mission Environmental Officer	_____ Harry Bottenberg	_____
Regional Environmental Advisor/ S&C Asia & OAPA	_____ Andrei Barannik	_____
Acting RLO Office Director	_____ James Noel	_____
Deputy Mission Director	_____ Michael McCord	_____
Mission Director	_____ Herbert Smith	_____

	<b>Approval:</b>	<b>Date:</b>
Acting Bureau Environmental Officer /Afghanistan and BEO/ME	_____ John Wilson	_____

DISTRIBUTION: MEO, COR/AOR, OAA, RLO

## Environmental Review Form for subprojects/subgrants

### A. Applicant information

Organization	Parent grant or project
Individual contact and title	Address, phone & email (if available)
Proposed subproject /subgrant (brief description)	Amount of funding requested
	Period of performance
	Location(s) of proposed activities

### B. Activities, screening results, and findings

Proposed activities (Provide DESCRIPTIVE listing. Continue on additional page if necessary)	Screening result (Step 3 of instructions)			Findings (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities ONLY)		
	Very Low Risk	High-Risk*	Moderate or unknown risk*	significant adverse impacts are very unlikely	With specified mitigation, significant adverse impacts are unlikely	Significant Adverse Impacts are possible
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						

\*These screening results require completion of an Environmental Review Report

### C. Certification:

I, the undersigned, certify that:

1. The information on this form and accompanying environmental review report (if any) is correct and complete.
2. Implementation of these activities will not go forward until specific approval is received from the C/AOTR.
3. All mitigation and monitoring measures specified in the Environmental Review Report will be implemented in their entirety, and that staff charged with this implementation will have the authority, capacity and knowledge for successful implementation.

(Signature) \_\_\_\_\_ (Date) \_\_\_\_\_

(Print name) \_\_\_\_\_ (Title) \_\_\_\_\_

**Note: if screening results for any activity are "high risk" or "moderate or unknown risk," this form is not complete unless accompanied by an environmental review report.**

### BELOW THIS LINE FOR USAID USE ONLY

#### Notes:

1. For clearance to be granted, the activity MUST be within the scope of the activities for which use of the ERF is authorized in the governing IEE. **Review IEE before signature.** If activities are outside this scope, deny clearance and provide explanation in comments section. The Partner, C/AOTR, MEO and REA must then confer regarding next steps: activity re-design, an IEE or EA.

2. Clearing an ERF containing one or more findings that **significant adverse impacts are possible** indicates agreement with the analysis and findings. It does NOT authorize activities for which "significant adverse impacts are possible" to go forward. It DOES authorize other activities to go forward. The Partner, C/AOTR, MEO and REA must then confer regarding next steps: activity re-design, an IEE or EA.

#### Clearance record

C/AOTR	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID/Afghanistan MEO	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
Regional Env. Advisor (REA)	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
Bureau Env. Officer (BEO)*	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			

C/AOTR, MEO and REA clearance is required. BEO clearance is required for all "high risk" screening results and for findings of "significant adverse impacts possible. The BEO may review "

**Note: if clearance is denied, comments must be provided to applicant**  
(use space below & attach sheets if necessary)

# Environmental Review Report

- A. Summary of Proposal.** *Very briefly summarize background, rationale and outputs/results expected. (Reference proposal, if appropriate).*
- B. Description of Activities.** *For all moderate and high-risk activities listed in Section B of the ERF, succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during all project phases and who will undertake them. (All of this information can be provided in a table). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.*
- C. Site-specific Environmental Situation & Host Country Requirements.** *Describe the environmental characteristics of the site(s) where the proposed activities will take place. Focus on site characteristics of concern—e.g., water supplies, animal habitat, steep slopes, etc. With regard to these critical characteristics, is the environmental situation at the site degrading, improving, or stable?*
- Also note applicable host country environmental regulations and/or policies. (For example, does the project require host country environmental review or permitting? Building approval? Etc.)*
- NOTE: provide site-specific information in this section, NOT country-level information. General information about country level conditions should already be contained in the IEE governing the **XXX project/program**.*
- D. Environmental Issues, Mitigation Actions, and Findings.** *Using the table provided, identify all potential impacts for each activity. These must include all phases (planning & design, construction and handover, operation, and decommissioning). Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.) Indicate also positive impacts and how the natural resources base will be sustainably improved. Identify actionable mitigation actions to avoid, reduce or compensate for negative impacts, such as restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents. Mitigation actions should be assigned to the responsible party, for example the construction contractor, the implementing partner, the beneficiaries.*

Project Phase and Activity	Potential Environmental Impact	Mitigation Action
Planning and Design		

Construction and Handover		
Operation		
Decommissioning		

- E. **Environmental Mitigation and Monitoring Plan (EMMP).** *Set out how compliance with mitigation actions will be monitored/verified. This includes specifying WHO will be responsible for the various mitigation actions, and HOW implementation of the mitigation actions will be tracked/verified.*

*Also specify how you will report to USAID on the implementation of mitigation actions. (You are REQUIRED to provide your C/AOTR with sufficient information on the status of mitigation implementation for USAID to effectively fulfill its oversight and performance monitoring role.)*

*Again, choose a format and structure that presents the necessary information clearly and succinctly. EMMPs are typically in table format, and often include a compliance log or "monitoring record" section that records implementation status of the various mitigation*

actions. The EMMP with current monitoring log can then simply be submitted to the C/AOTR with the quarterly or 6-month project report, satisfying the environmental compliance reporting requirement. .

The most basic EMMP format is

Mitigation action	Responsible Party	Monitoring/Verification Method	Monitoring Record (date, result, corrective actions taken, if any)

For additional EMMP formats and examples, see the ENCAP EMMP factsheet, available via [www.encapafrika.org/meoEntry.htm](http://www.encapafrika.org/meoEntry.htm)

- F. **Other Information.** *Where possible and as appropriate, include photos of the site and surroundings; maps; and list the names of any reference materials or individuals consulted.*

*(Pictures and maps of the site can substantially reduce the written description required in parts B & C)*